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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO WESTERN DIVISION

JAN 22 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

| UNITED STATES OF AMERICA, |) |
|---------------------------|---|
| Plaintiff, |) INFORMATION) O D D D D D D D D D D D D D D D D D D |
| v. |) CASE NO. |
| STEVEN STEWART, | Title 18, United States Code, Section 666; Title 26, United States Code, Section |
| Defendant. |) 7206(1) JUDGE ZOUHARY |

COUNTS 1–2 (Program Fraud, 18 U.S.C. § 666(a)(1)(A)) MAG JUDGE CLAY

The Acting United States Attorney charges:

1. On or about the below dates, in the Northern District of Ohio, Western Division,
Defendant STEVEN STEWART, being an agent of the North Baltimore Local School District
during a one-year period in which the North Baltimore Local School District received over
\$10,000 in federal funds, embezzled, stole, and fraudulently obtained property valued at \$5,000
or more owned by and under the care, custody, and control of the North Baltimore Local School
District, as follows:

| Count | Approximate Date | Description of Funds | | | | |
|-------|--------------------|--|--|--|--|--|
| 1 | September 30, 2020 | \$17,500 cash withdrawal | | | | |
| 2 | August 7, 2022 | \$75,763 for the purchase of a 2022 Ford F-150 | | | | |

All in violation of Title 18, United States Code, Section 666(a)(1)(A).

DRIGINAL

COUNTS 3-6 (Making and Subscribing False Tax Returns, 26 U.S.C. § 7206(1))

The Acting United States Attorney further charges:

2. On or about the below dates, in the Northern District of Ohio, Western Division, Defendant STEVEN STEWART did willfully make and subscribe U.S. Individual Income Tax Returns, Forms 1040, for the calendar years stated below, each of which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, and each of which the defendant did not believe to be true and correct as to every material matter in that, as the defendant then and there well knew and believed, each said return understated the amount of his taxable income for the year, as set forth in Counts 3–6 below:

| Count | Calendar Year | Date | Approximate Unreported Income |
|-------|---------------|----------------|-------------------------------|
| 3 | 2019 | March 5, 2020 | \$283,316.06 |
| 4 | 2020 | March 11, 2021 | \$171,784.60 |
| 5 | 2021 | April 12, 2022 | \$91,974.23 |
| 6 | 2022 | March 15, 2023 | \$77,261.62 |

All in violation of Title 26, United States Code, Section 7206(1).

FORFEITURE

The Acting United States Attorney further charges:

3. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the allegations in Counts 1-2 are incorporated herein by reference. As a result of the foregoing offense, Defendant STEVEN STEWART shall forfeit to the United States any and all property constituting, or

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derived from, any proceeds he obtained, directly or indirectly, as the result of such violation; and any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

CAROL M. SKUTNIK
Acting United States Attorney

| By: | | | | | | |
|-----|---|---|-----|--|--|--|
| | | | | | | |
| | - | - | . • | | | |

Ava R. Dustin Toledo Branch Chief derived from, any proceeds he obtained, directly or indirectly, as the result of such violation; and any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

CAROL M. SKUTNIK Acting United States Attorney

By:

va R. Dustin

Toledo Branch Chief